

REMARKS

Please reconsider the application in view of the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 25-49 are currently pending in this application. Claims 25 and 27 are independent. The remaining claims depend, directly or indirectly, from claims 25 and 27.

Rejections Under 35 U.S.C. § 102

Claims 25-41, 44, 45, 47, and 48 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,546,280 ("Pfluger"). This rejection is respectfully traversed.

For anticipation under 35 U.S.C. § 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. The Applicant respectfully asserts that Pfluger fails to disclose both a cover and a phase connector *supported on the cover*, as recited in the independent claims.

Turning to the rejection of the claims, with reference to Figure 1 of Pfluger, the Examiner alleges that reference number 39 is equivalent to the claimed phase connector, and reference 20 is equivalent to the cover on which reference number 39 is supported. *See* Office Action mailed September 25, 2007, pages 2-3. However, upon a complete reading of Pfluger, it is clear that reference number 20 of Pfluger is disclosed as an internal plastic *bearing plate/shield*, which is completely distinct from a cover for the alternator. In fact, the actual cover for the alternator disclosed by Pfluger is shown by the partial (*i.e.*, dotted) lines in Figure 1 of Pfluger. *See* Pfluger, col. 4, ll. 20-23. In addition, the bearing plate of Pfluger is not mounted on the rear bearing (reference number 8 in Figure 1 of Pfluger). Rather, Pfluger clearly states

that the ball bearing (8) is received into a hub of the bearing plate (20). Therefore, instead of the bearing plate being placed/mounted on the bearing (8), the bearing (8) is placed into a central hub portion of the bearing plate such that the bearing plate supports the bearing instead of the bearing supporting the bearing plate, as is required by the claimed invention. Thus, the bearing shield of Pfluger is not equivalent to the cover of the claimed invention, as alleged by the Examiner.

Further, reference number 39 shown in Figure 1 of Pfluger is described as being one of multiple "terminal elements" to connect with blank terminal end portions of the phase windings (see Pfluger, col. 3, beginning at line 60). The terminal elements are "molded into" the bearing plate (20), which is clearly distinct from being supported by a cover of the alternator. Even assuming, *arguendo*, that the terminal elements of Pfluger are molded into the bearing plate/shield for purposes of support (which is not disclosed anywhere in Pfluger), it is still not the case that the terminal elements are *supported by a cover*, because the bearing plate does not function as a cover to the alternator.

In view of the above, it is clear that Pfluger fails to disclose each and every element of the independent claims. Thus, independent claims 25 and 27 are patentable over Pfluger. Pending dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 27, 42, and 43 stand rejected under 35 U.S.C. 102(b) as being anticipated by US Patent No. 4,705,983 ("Franz"). This rejection is respectfully traversed.

Franz discloses an alternator that is similar to the alternator disclosed by Pfluger. It appears from the Examiner's comments on page 6 of the Office Action mailed September 25,

2007, that the Examiner alleges that the plastic closing cap (62) shown in Figure 1 of Franz is equivalent to the cover claimed in the present invention. Although Franz discloses that the plastic closing cap (62) is connected to a bearing shield (1) on the drive side and protects another bearing shield (8), the plastic closing cap (62) disclosed in Franz does not *support a phase connector*, as required by the independent claims of the present application. In fact, Applicants assert that the Examiner has not adequately pointed to any element of Franz that the Examiner believes is equivalent to the phase connector of the claimed invention.

Franz discloses three phase windings (12, 13, and 14 of Figure 4 in Franz) with winding terminals (U, V, W) within the discussion of the electrical connections of the alternator (*see* Franz, Figure 4). However, it is not clear whether the Examiner is equating the phase windings to the phase connector of the claimed invention. As Applicant can find no other relevant component in Franz, Applicant assumes that the Examiner refers to the phase windings of Franz as being equivalent to the phase connector of the present invention. However, there is absolutely no indication in Franz that the phase windings are supported on the plastic closing cap (62). In fact, the discussion of the plastic closing cap (62) of Franz does not refer to or have anything to do with the phase windings of the alternator. Thus, it follows that Franz also fails to disclose a phase connector supported on the cover.

In view of the above, it is clear that Franz fails to disclose each and every element of independent claim 27. Thus, independent claim 27 is patentable over Franz. Pending dependent claims 42 and 43 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections Under 35 U.S.C. § 103

Claims 46 and 49 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Pfluger in view of US Patent No. 6,424,065 ("Vlemmings"). This rejection is respectfully traversed.

As described above, Pfluger fails to teach or suggest all the limitations of independent claim 27. Further, Vlemmings fails to supply that which Pfluger lacks, as evidenced by the fact that the Examiner relies on Vlemmings solely for the purpose of teaching a sensor holder and a sensor holder connector, wherein the sensor holder is mounted under the bottom of the cover, and the sensor holder connector passes radially through an opening in a peripheral annular wall of the cover. *See* Office Action mailed September 25, 2007, page 7. In view of the above, it is clear that independent claim 27 is patentable over Pfluger and Vlemmings, whether considered separately or in combination. Dependent claims 46 and 49 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 17170/010001).

Dated: December 21, 2007

Respectfully submitted,

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